UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

QUICK REFERENCE FOR STATUS OF ENVIRONMENTAL INDICATORS					
Name and EPA I.D. Number	Location (City or Town)	Current CA725 Decision	Current CA750 Decision	If Current Decision is Negative, Projected Date for Positive EI	
				CA725	CA750
Pine Belt Wood Preserving, Inc. MSD 991 277 195	Laurel, Mississippi		YE		

4WD-RPB

SUBJ: Evaluation of Pine Belt Wood Preserving, Inc.'s status under the RCRIS Corrective Action Environmental Indicator Event Code CA750
EPA I.D. Number: MSD 991 277 195

FROM: Russ McLean 8/24/04
Environmental Engineer

THRU: Doug McCurry, Chief 9/16/04
South Programs Section

TO: Jon D. Johnston, Chief 9/23/04
RCRA Programs Branch

I. PURPOSE OF MEMO

This memo is written to formalize an evaluation of Pine Belt Preserving, Inc.'s status in relation to the following corrective action event codes defined in the Resource Conservation and Recovery Information System (RCRIS):

Migration of Contaminated Groundwater Under Control (CA750).

Concurrence by the RCRA Programs Branch Chief is required prior to entering these event codes into RCRIS. Your concurrence with the interpretations provided in the following paragraphs and the subsequent recommendations is satisfied by dating and signing at the appropriate location within Attachments 1 and 2.

II. HISTORY OF ENVIRONMENTAL INDICATOR EVALUATIONS AT THE FACILITY AND REFERENCE DOCUMENTS

This particular evaluation is the third evaluation for the Pine Belt Wood Preserving, Inc. facility in Laurel, Mississippi. The first evaluation of the facility was conducted on April 29, 1997 and resulted in a CA750 status code of IN, insufficient information available for determining if ground-water releases are controlled. The second evaluation was conducted on November 11, 2000 and also resulted in a CA750 status code of IN. A copy of this second evaluation is attached.

III. FACILITY SUMMARY

The Pine Belt Wood Preserving, Inc. facility consists of approximately 4.5 acres located in the city of Laurel, Jones County, Mississippi. The site is located in a light industrial area and is bounded on the south by a pulpwood yard, on the west by an inactive railroad line, on the east by undeveloped woodlands and on the north by the Daphne Branch of the Tallahala Creek. Wood preserving operations began in 1970 under the ownership of J. M. Christian, using the preservative pentachlorophenol (PCP). In 1975, the facility added the chromated copper arsenate (CCA) process. In June 1980 the facility was purchased by Pine Belt Wood Preserving, Inc. Pine Belt discontinued the use of CCA in 1985 and ceased all facility operations in 1989. All process equipment and storage tanks have been removed from the site.

Prior to 1983, bottom sediments generated from the treatment of process waste waters associated with PCP operations, were managed in an on-site surface impoundment. This impoundment was classified as a hazardous waste unit in 1980, under RCRA, and was closed with waste in-place in October 1987. The State of Mississippi issued a RCRA permit for post-closure care of the impoundment in June 1988, which contains the requirement to operate and maintain a ground-water detection monitoring system. This system was installed in August 1985 and consisted of four monitoring wells. In 1999, based on the findings of an assessment of the existing ground-water monitoring system, the decision was made to replace two of the down-gradient and the up-gradient wells with newly installed wells. This decision was based on anomalous water level data from historical monitoring events and structural integrity problems suspected in two of the down-gradient wells. The facility remains in detection monitoring.

The HSWA permit was issued by EPA in May 1990 and required an RFI for 17 of the 23 SWMUs identified during the RCRA Facility Assessment (RFA) conducted in April 1988. In 1991, the EPA Region 4 Environmental Services Division conducted a RCRA Case Development Investigation. This investigation consisted of surface and subsurface soil sampling on-site and off-site and sediment sampling in the on-site drainage ditches and off-site in Daphne Branch. Samples were analyzed for metals, extractable and purgeable organic compounds and dioxin/furans. In June 2002 Pine Belt submitted a report presenting the results of two temporary groundwater monitoring wells installed downgradient of the former process area. This report was submitted as a requirement of the RFI to investigate potential groundwater impacts to the uppermost aquifer from those SWMUs associated with the former process area as identified in the RFA. The results of this investigation indicated that two wood preserving constituents, naphthalene and pentachlorophenol (PCP), are present in a shallow perched groundwater zone. Based on this finding, Pine Belt installed five permanent groundwater monitoring wells to delineate this

contamination and to determine if any impact to Daphne Branch is occurring. The results of this investigation were reported to EPA in October 2002. To determine the fate and transport of this contamination and its impact on Daphne Branch, Pine Belt instituted a quarterly monitoring program for groundwater and surface water in Daphne Branch over a one year period. An evaluation of the results of this program were submitted to EPA in a report dated May 7, 2004.

IV. CONCLUSION FOR CA750

It is recommended that the status code YE be entered into RCRIS for CA750, ground-water releases are controlled. As mentioned above, ground water in a shallow perched zone is contaminated with PCP and PAH constituents. The results of the groundwater investigation/monitoring and the quarterly sampling program indicate that the discharge of contaminated groundwater into Daphne Branch does not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented.

Attachments:
1. CA750: Migration of Contaminated Groundwater Under Control
2. Second EI Evaluation

ATTACHMENT
DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)
Migration of Contaminated Groundwater Under Control

Facility Name: Pine Belt Wood Preserving, Inc.
Facility Address: Highway 15 South, Laurel, Mississippi 39440
Facility EPA ID #: MSD 991 277 195

1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

__X__ If yes - check here and continue with #2 below,

_____ If no - re-evaluate existing data, or

_____ If data are not available, skip to #8 and enter"IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Is groundwater known or reasonably suspected to be "contaminated"[1] above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

__X__ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

____ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s) PCP and naphthalene have been detected in ground water in a shallow perched water zone above relevant action levels. This zone appears to be seasonal, is limited in areal extent and is separated from the semi-confined deeper aquifer by a clay layer with an average thickness of seven feet across the site. This contamination was documented during the RFI and is likely associated with SWMUs within the former process area. During a Case Development Investigation conducted in April 1991 elevated levels of pentachlorophenol (PCP) and PAH constituents were identified in subsurface soils throughout the former process area. PCP was detected at a maximum concentration of 1100 mg/kg and total PAHs were detected at a maximum concentration of 982 mg/kg. Two temporary groundwater monitoring wells were installed downgradient of the former process area as the first phase of the groundwater investigation. Sampling results indicated that naphthalene and PCP were detected in a shallow perched water zone in well TW-2 at a concentration of 41.6 and 980 µg/l respectively. Based on the results of this investigation, Pine Belt installed five permanent groundwater monitoring wells to delineate the horizontal and vertical extent of the contamination. Four of these wells were completed in the shallow perched water zone and one well was completed in the deeper semi-confined aquifer to delineate the vertical extent of this contamination. Well locations are depicted in Figure 1. Initial sampling results detected naphthalene at a maximum concentration of 146 µg/l in MW-6 and PCP at a maximum concentration of 15,545 µg/l, also in MW-6. The monitoring well in the deeper zone, MW-10, was non-detect for all constituents sampled. Based on these results, Pine Belt initiated a quarterly sampling program over a one-year period to observe contaminant trends and seasonal fluctuations. During this period naphthalene and PCP levels remained fairly consistent in wells MW-6 and MW-7 with the highest concentrations detected in MW-6. MW-8 and the deeper well, MW-10, remained non-detect for either constituent throughout the period. Water level elevations in the shallow perched zone fluctuated by about 3 feet during the period with the difference in elevation between the shallow perched zone and the deeper zone averaging approximately 7 feet.

Groundwater monitoring at the site is also conducted by a detection monitoring system associated with the closed surface impoundment and operated under the State Hazardous Waste Management permit. This system was installed in August 1985 and originally consisted of four monitoring wells. This system detected organic constituents associated with wood preserving operations. These detections were sporadic, being detected in all four (4) monitoring wells, including the up-gradient well. Since September 1985, the following constituents have been detected above the relevant action level during the semi-annual sampling events: Pentachlorophenol at a maximum concentration of 2009 µg/l. (MCL = 1 µg/l) 2,4-Dinitrophenol at a maximum concentration of 520 µg/l. (Region 9 PRG = 73 µg/l.), Naphthalene at a maximum

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[1] **"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).**

concentration of 3409 µg/l. (Region 9 PRG = 6.2 µg/l) and Acenaphthylene at a maximum concentration of 2257 µg/l. (Region 9 PRG = 370 µg/l.). In 1999, based on the findings of an assessment of the existing ground-water monitoring system, the decision was made to replace the existing wells with the installation of two down-gradient and one up-gradient well. This decision was based on anomalous water level data from historical monitoring events and structural integrity problems suspected in two of the down-gradient wells. Since monitoring of the new wells commenced in November 1999, all monitored constituents have been non-detect.

References: Evaluation of Facility Status with Regards to EPA Environmental Indicator CA750, Migration of Contaminated Groundwater Under Control, May 7, 2004; Quarterly SWMU Monitoring Reports for sampling events conducted April 17, 2003, July 29, 2003, November 20, 2003 and February 20, 2004; Semi-Annual Ground-Water Monitoring Reports, March 1, 1999 through March 1, 2004; Groundwater Investigation Report, June 6, 2002; Summary of Facility Investigations and Planned Corrective Actions, October 31, 1997; SWMU Corrective Action Information, July 26, 1999; Groundwater Monitoring System Assessment, January 11, 1999, RCRA Case Development Investigation/Evaluation, ESD Project No. 91e-330, April 1991.

3. Has the migration of contaminated groundwater stabilized such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"[7] as defined by the monitoring locations designated at the time of this determination?

__X__ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"[7]).

____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"[2]) - skip to #8 and enter "NO" status code, after providing an explanation.

____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s): EPA's "Supplemental Guidance for Determination of Environmental Indicator CA 750, Migration of Contaminated Groundwater Under Control: Groundwater-Surface Water Interactions" states in Section II.E. "Alternatively, the plume of groundwater contamination might not be expanding within the geologic formation due to the fact that the contaminated groundwater has intersected with and is discharging into a hydraulically connected surface water body. In such a situation, the plume of contaminated groundwater is not getting any bigger (i.e., the plume has "stabilized") because it is migrating into surface water."

As part of the groundwater investigation under the RFI, groundwater elevations were measured during each sampling event and the flow direction was determined to be toward Daphne Branch. Water elevations were also measured in Daphne Branch during each groundwater sampling event. Surface water elevation is shown to be below that measured in the monitoring wells installed into the shallow perched water zone indicating the groundwater in this zone is intercepted by Daphne Branch, eliminating any further downgradient transport. As stated in the discussion to Question 2 above, during the RFI, one well was installed into the deeper groundwater zone. This zone is monitored as part of the Detection Monitoring system for the closed surface impoundment. This well was originally non-detect for the five semi-volatile constituents which are routinely monitored for in the Detection Monitoring program, and has been non-detect for PCP and naphthalene in each subsequent sampling event conducted as part of the RFI. This demonstrates the vertical delineation of the contamination has been defined and no impact to the deeper groundwater zone within the uppermost aquifer is indicated.

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2 **"existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.**

4. Does "contaminated" groundwater discharge into surface water bodies?

__X__ If yes - continue after identifying potentially affected surface water bodies.

____ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s): As demonstrated above, groundwater in the shallow perched water zone, which has been impacted by the constituents PCP and naphthalene, discharges into Daphne Branch. Daphne Branch is a small natural drainage ditch that originates approximately two miles upstream of the site in the urban area of Laurel, Mississippi and terminates less than one mile downstream as a tributary to Tallahala Creek. At the site, Daphne Branch has no potential for use as a fishable/swimmable stream or for other recreational use anywhere along its length due to its small size and intermittent flow. This drainage feature transports rainfall run-off and typically has very low dry weather flow rates. During times of limited rainfall, flow channels of less than one-foot in width can be observed, and flow during these periods has been measured to be less than 10 gallons per minute at the site.

5. Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the maximum concentration[8] of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature and number of discharging contaminants, or environmental setting) which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration[8] of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) providing a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

__X__ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration[8] of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations[3] greater than 100 times their appropriate groundwater "levels," providing the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identifying if there is evidence that the amount of discharging contaminants is increasing.

____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s): The Supplemental Guidance referenced under Question 3 above bases a determination to this question on concepts developed by EPA's Office of Water, which administers the Clean Water Act. As a national policy, the Clean Water Act stipulates that the classification of all waters of the United States should at a minimum be "fishable/swimmable". As described above, Daphne Branch has no potential for use as a "swimmable/fishable" water body. However, for the purpose of this evaluation the procedures for making these determination will be presented.

To determine the potential for human health impacts, the supplemental guidance cites the use of the EPA approved State Water Quality Standard for "consumption of organisms only" for surface water not classified for drinking water use. As described above Daphne Branch is a small drainage ditch and there is no known use of surface water as a drinking water source at any downstream location. The Water Quality Standard for "consumption of organisms only" for PCP is 8.2 μg/l. No Water Quality Standard is established for naphthalene therefore, the EPA, Region 4 Chronic Screening Value of 62 μg/l is used to determine potential human health impacts which is equivalent to the EPA, Region 9 PRG for Tap Water.

For protection of aquatic life the supplemental guidance cites the use of the EPA approved State Freshwater Criteria Continuous Concentration (CCC). This value is 15 μg/l for PCP and is not established for naphthalene. If no CCC is available, the supplemental guidance recommends the use of the Region 4 Freshwater Surface Water Chronic Screening value. As indicated above, this value is 62 μg/l for naphthalene. The next step in making the determination of whether the discharge of "contaminated" groundwater into surface water is likely to be "insignificant" is to compare measured groundwater concentrations at the point of discharge to surface water to 10 times the appropriate criteria for both

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3 **As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.**

human health and aquatic life. Although there is not a monitoring well at the discharge point to Daphne Branch, contaminant concentrations measured at MW-7 will be used. This well is located within 50 feet of Daphne Branch (figure 1). The maximum concentrations of PCP and naphthalene detected in this well are 1985 μg/l and 25.7 μg/l, respectively. Comparing the maximum concentrations found in MW-7 to the criteria concentrations identified above, indicates that the discharge of naphthalene from groundwater into surface water is considered "insignificant" for EI purposes while the discharge of PCP is not considered "insignificant".

6. Can the discharge of "contaminated" groundwater into surface water be shown to be "currently acceptable" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented[4])?

__X__ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,[5] appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

____ If no - (the discharge of "contaminated" groundwater can not be shown to be "currently acceptable") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

____ If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s): Method 1 of the supplemental guidance suggests the use of remedial actions that have been implemented and showing, through periodic monitoring reports, that the current discharge of groundwater contaminants to the surface water body are acceptable. Interim Measures were completed at the site in 1999 which consisted of soil removal activities at selected locations within the former process area, backfilling , grading and the installation of a cover system over this area. Also included was the planting of grasses in non-capped areas to control erosion. The cap system over the source areas prevents the continued leaching of contaminants resident in the soils by rainfall infiltration, effectively preventing further plume expansion.

As part of the quarterly groundwater monitoring program for the wells installed downgradient of the former process area, as described in the discussion for Question 2, surface water sampling was conducted at four locations along Daphne Branch. One location is upstream of the facility and three locations are

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[4] **Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.**

[5] **The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.**

downstream; at the northeast property boundary, at the Entrance Road Bridge and at the Highway 15 Bridge. These locations are indicated in Figure 2. Only PCP was detected, with a maximum concentration of 15 μg/l at the northeast property boundary. The only other location that detected PCP was at the Entrance Road Bridge, where a maximum concentration of 11.8 μg/l was detected.

As stated previously, Daphne Branch cannot support a recreational fishery and as such an actual exposure pathway through fish consumption does not exist. Additionally, the criterion for protection of aquatic life, the State Freshwater CCC, is 15 μg/l for PCP. This is the maximum PCP concentration detected at the northeast property boundary during surface water sampling. Again, one of the modifying factors to be considered in this determination is that Daphne Branch is a predominantly urban drainage feature with intermittent flow and not likely to contain any significant ecological receptors. Further, the maximum concentration of PCP detected at the Entrance Road Bridge, is below this criterion concentration and has been non-detect during all quarterly sampling events at the Highway 15 Bridge, which is a considerable distance upstream of the confluence with Tallahala Creek.

7. Will groundwater monitoring / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

_X_ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

____ If no - enter "NO" status code in #8.

____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s): Pine Belt proposes to continue monitoring the wells completed in the upper perched water zone semi-annually through the post-closure care period to confirm that contaminated groundwater remains within the original area of the contaminant plume and to track the natural attenuation of this plume. Additionally, Pine Belt proposes to monitor surface water in Daphne Branch at the Entrance Road Bridge and the Highway 15 Bridge in conjunction with the semi-annual groundwater monitoring to demonstrate the lack of any significant surface water impact. EPA will incorporate these conditions into the final remedy selection for this facility.

RCRA Corrective Action
Environmental Indicator (EI) - RCRAInfo Event Code CA750

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

__X__ YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the **Pine Belt Wood Preserving facility , EPA ID # MSD 991 277 195, located at Highway 15 South, Laurel, Mississippi.** Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

____ IN - More information is needed to make a determination.

Completed by: _____ Date 8/24/04
Russ McLean
Environmental Engineer
EPA Region 4

Supervisor: _____ Date 9/16/04
Doug McCurry
Chief, South Programs Section
EPA Region 4

Branch Chief: _____ Date 9/23/04
Jon D. Johnston
Chief, RCRA Programs Branch
EPA Region 4

Locations where References may be found:

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10th Floor, 61 Forsyth Street SW
Atlanta, Georgia 30303

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Russ McLean
(404) 562-8504
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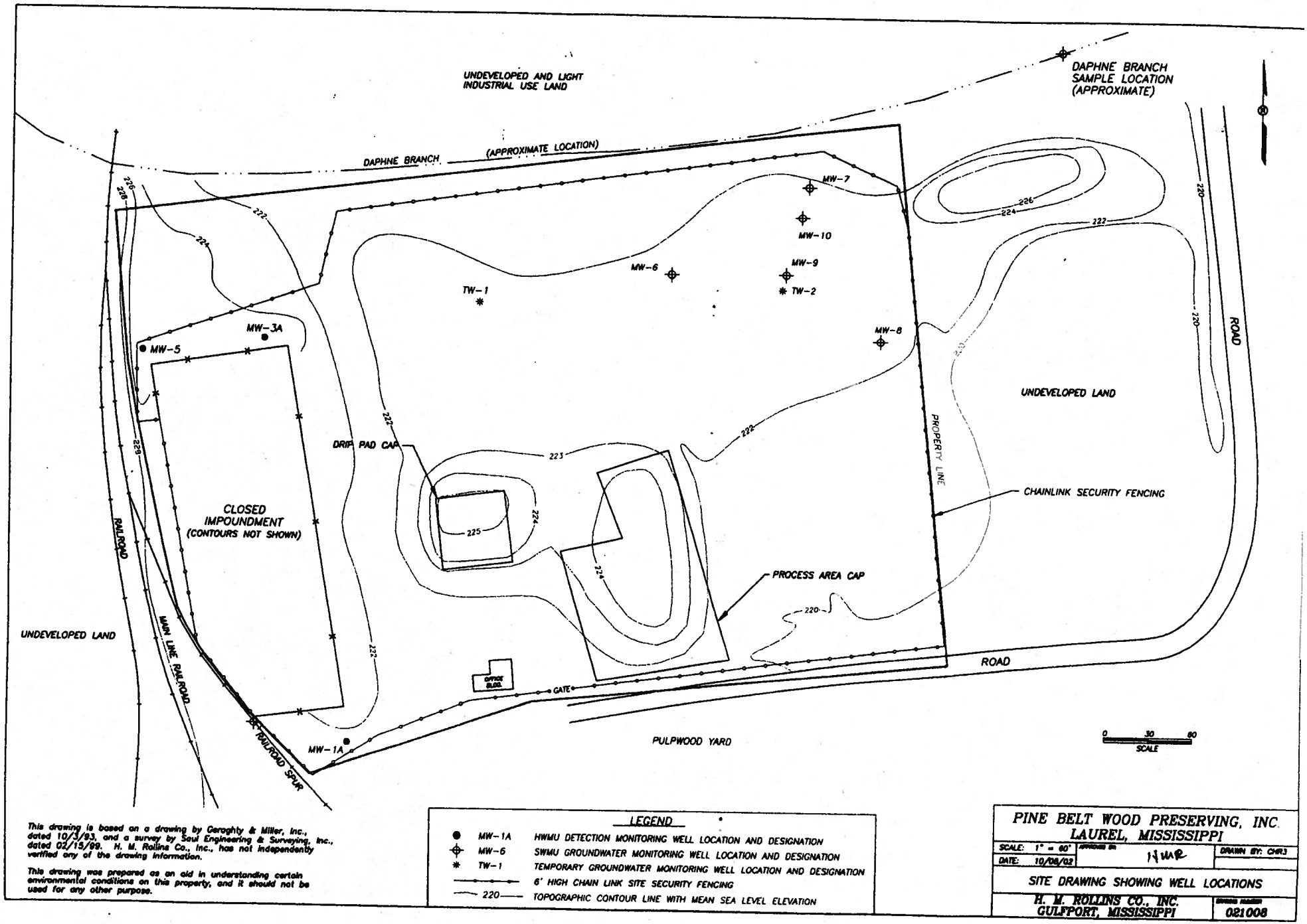
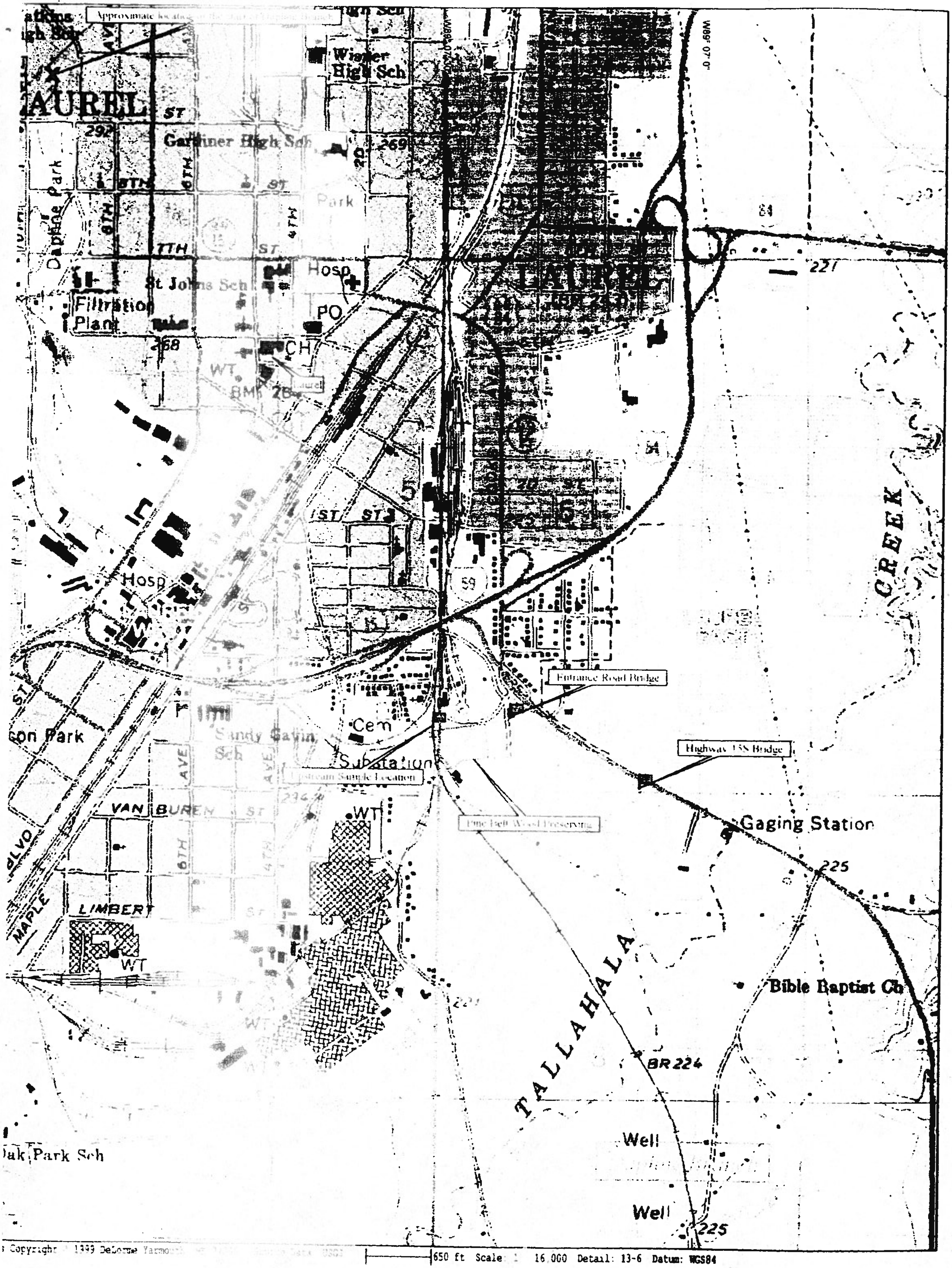

UNDEVELOPED AND LIGHT INDUSTRIAL USE LAND
DAPHNE BRANCH SAMPLE LOCATION (APPROXIMATE)
DAPHNE BRANCH (APPROXIMATE LOCATION)
MW-7
MW-10
MW-9
MW-6
TW-1
TW-2
MW-8
MW-3A
MW-5
MW-1A
DRIP PAD CAP
CLOSED IMPOUNDMENT (CONTOURS NOT SHOWN)
PROPERTY LINE
CHAINLINK SECURITY FENCING
PROCESS AREA CAP
UNDEVELOPED LAND
ROAD
RAILROAD
MAIN LINE RAILROAD
RAILROAD SPUR
OFFICE BLDG.
GATE
PULPWOOD YARD
SCALE
0 30 60
LEGEND
MW-1A HWMU DETECTION MONITORING WELL LOCATION AND DESIGNATION
MW-6 SWMU GROUNDWATER MONITORING WELL LOCATION AND DESIGNATION
TW-1 TEMPORARY GROUNDWATER MONITORING WELL LOCATION AND DESIGNATION
6' HIGH CHAIN LINK SITE SECURITY FENCING
220 TOPOGRAPHIC CONTOUR LINE WITH MEAN SEA LEVEL ELEVATION
This drawing is based on a drawing by Geraghty & Miller, Inc., dated 10/3/93, and a survey by Saul Engineering & Surveying, Inc., dated 02/15/99. H. M. Rollins Co., Inc., has not independently verified any of the drawing information.
This drawing was prepared as an aid in understanding certain environmental conditions on this property, and it should not be used for any other purpose.
PINE BELT WOOD PRESERVING, INC.
LAUREL, MISSISSIPPI
SCALE: 1" = 60'
DATE: 10/08/02
DRAWN BY: CHR3
SITE DRAWING SHOWING WELL LOCATIONS
H. M. ROLLINS CO., INC.
GULFPORT, MISSISSIPPI
021008

Figure 1


Approximate
Wisner High Sch
LAUREL
Gardiner High Sch
Daphne Park
Park
Hosp
St Johns Sch
Filtration Plant
PO
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Laurel
LAUREL
221
Entrance Road Bridge
Highway 15S Bridge
Gaging Station
CREEK
Cem
Substation
Upstream Sample Location
Pine Belt Wood Preserving
VAN BUREN ST
LIMBERT
MAPLE
Bible Baptist Ch
TALLAHALA
BR 224
Well
Well
225
Oak Park Sch
Copyright 1999 DeLorme Yarmouth
650 ft Scale 1 : 16,000 Detail: 13-6 Datum: WGS84

Figure 2